

To: Cantor, Howard[cantor.howard@epa.gov]; Fay, Kate[Fay.Kate@epa.gov]
Cc: Acting Administrator[(b)(6) privacy (email address)]epa.gov]
From: Sussman, Bob
Sent: Mon 3/4/2013 3:11:22 PM
Subject: Fw: pavillion

Per our discussion with Kate over the weekend, here is the first of two documents we received from the Wyoming Governor's office re Pavillion. I'll send the second soon. Before Bob's arrival in Denver, let's have a call among the three of us to discuss. I'll schedule.

From: Jerimiah Rieman
Sent: Friday, March 01, 2013 12:26:20 PM
To: Sussman, Bob; Pallone, Sarah
Subject: Deliverable: Part 1 of 2

Bob, Sarah-

The following is deliverable 1 of 2. This includes the purpose and scope of work for the well bore integrity technical and regulatory analysis. This analysis is dependent in part upon domestic water well evaluation (deliverable 2 of 2). That information will come in another e-mail as soon as I have received it from the Department of Environmental Quality. I have stressed that I need that information for our call. The second part of the information provided here - criteria for selection of specialized expert(s).

Well Bore Integrity – Final Report

The Wyoming Oil and Gas Conservation Commission (WOGCC) will develop a report that includes its technical and regulatory analysis along with assumptions and recommendations concerning the integrity of all natural gas exploration and production wells within 1320 feet of domestic water wells identified as of interest by the Wyoming Department of Environmental Quality (WDEQ). The WOGCC will contract with a specialized expert to review and comment on the commission's analysis of well bore integrity in those wells.

In developing its report, the WOGCC will solicit data from the WDEQ, SEO, EPA, USGS, and BLM, as necessary, in order to complete its technical and regulatory analysis. The purpose of the review is to provide the commission, the Wellbore Integrity Working Group and the public with an additional level of confidence in its current findings and recommendations. Specifically, the WOGCC will determine if records and test results sufficiently demonstrate that wellbore construction is adequate to protect those domestic wells within 1320 feet of the wellbores.

The report will consist of a comprehensive review of the following:

- location (Q/Q, STR);
- distance to water well;
- lease type (fee, tribal);
- API #;
- date completed;
- operator;
- surface casing and cement;
- mud system;
- total depth;
- production casing and cement;
- cement bond log results;
- bradenhead test results;
- mechanical integrity tests;
- gas analysis from bradenhead and tubing;
- subsequent remedial work; and
- other data in the WOGCC records that are deemed pertinent.

The specialized expert will augment the current WOGCC staff by reviewing and commenting on the technical and regulatory analysis and associated assumptions and recommendations. It is expected that this specialized expert, working with WOGCC staff, will identify data gaps, including the need for any additional testing and analysis. Any required work will be completed prior to the preparation of the WOGCC's final report.

The specialized expert will augment the current WOGCC staff by providing this review and will aid in the production of a final report to be submitted to the commission, the Wellbore Integrity Working Group and other stakeholders. The final report will evaluate the listed data and address compliance with WOGCC regulatory requirements.

Selection of Specialized Expert(s)

The following criteria will be used in the selection of specialized expert(s):

- An individual with both industry and academic experience, with additional consideration

given for academic expertise.

- Professional Engineer preferable, but not necessary.
- An individual with regional expertise (geologic, etc.).
- No financial conflict with Encana.
- Not affiliated with the EPA or Encana.
- Not affiliated with the University of Wyoming or the State of Wyoming.

I look forward to our conversation.

Jerimiah

Jerimiah L. Rieman
Natural Resource Policy Advisor
Office of Governor Matthew H. Mead
State Capitol
Cheyenne, WY 82002
307-777-5629
jerimiah.rieman@wyo.gov

E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties.